

ADMINISTRATIVE DRAFT

TRANSPORTATION AIR QUALITY CONFORMITY ANALYSIS

FOR
2007 TRANSPORTATION IMPROVEMENT PROGRAM/AMENDMENT #07-18

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I. SUMMARY OF CONFORMITY ANALYSIS

The federally required Transportation Improvement Program (TIP) is a comprehensive listing of all Bay Area transportation projects that receive federal funds or that are subject to a federally required action, or are considered regionally significant for air quality conformity purposes. The current 2007 TIP was developed to be consistent with MTC's Transportation 2030 Plan, the region's 25-year strategic investment plan for transportation projects in the nine-county San Francisco Bay Area. MTC adopted the 2007 TIP on July 26, 2006 (MTC Resolution No. 3755).

The 2007 TIP/Amendment #07-18 amends \$159 million in US DOT Urban Partnership Pilot Program Grants (UPP) into 12 projects in San Francisco, Marin and Alameda counties. The intent of the UPP is to encourage the implementation of congestion pricing and other innovative approaches to tackling traffic congestion in the nation's urban areas. The amendment also updates the scope and funding of the LAVTA BRT project in Alameda County.

Since the 2007 TIP/Amendment #07-18 does not include any new regionally significant projects beyond those currently included in the Transportation 2030 Plan, and these projects have been modeled in the appropriate horizon year using the latest planning assumptions, the conformity rule allows for the reliance on the previous regional emissions analysis for conformity determinations on TIPs that are consistent with the RTP (40 CFR §93.122(g)). Thus, MTC is using the latest conformity analysis for the Transportation 2030 Plan and 2007 TIP/Amendment #07-06 as the basis for the conformity determination for the 2007 TIP/Amendment #07-18. The latest conformity analysis is included in the report "Final Transportation Air Quality Conformity Analysis for the Amendment to the Transportation 2030 Plan and 2007 Transportation Improvement Program Amendment #07-06", which was approved by FHWA/FTA on June 14, 2007.

For purposes of the conformity analysis, we state for the record:

1. Latest Planning Assumptions, Emissions Model and Budget Comparison. No new regional emission analysis was necessary for this conformity determination. As stated above, this conformity determination is based on the regional emissions analysis performed for the Amendment to the Transportation 2030 Plan and 2007 TIP/Amendment #07-06. Please refer to the above referenced Conformity Report for the details of this analysis.
2. TCM Implementation: The Transportation Control Measures (TCMs) A through E in the approved 2001 Ozone Attainment Plan are fully implemented. All information on the timely implementation of TCMs in the Conformity Report is still current. Please refer to the above referenced Conformity Report for the details of this analysis.

3. Reliance on the Previous Regional Emissions Analysis: Since the conformity determination for the 2007 TIP/Amendment #07-18 relies on the previous regional emissions analysis, MTC is required to meet the requirements of 40 CFR §93.122(g), which are as follows:

(g) Reliance on previous regional emissions analysis.

(1) Conformity determinations for a new transportation plan and/or TIP may be demonstrated to satisfy the requirements of §§93.118 (“Motor vehicle emissions budget”) or 93.119 (“Interim emissions in areas without motor vehicle emissions budgets”) without new regional emissions analysis if the previous regional emissions analysis also applies to the new plan and/or TIP. This requires a demonstration that:

(i) The new plan and/or TIP contain all projects which must be started in the plan and TIP's timeframes in order to achieve the highway and transit system envisioned by the transportation plan;

(ii) All plan and TIP projects which are regionally significant are included in the transportation plan with design concept and scope adequate to determine their contribution to the transportation plan's and/or TIP's regional emissions at the time of the previous conformity determination;

(iii) The design concept and scope of each regionally significant project in the new plan and/or TIP are not significantly different from that described in the previous transportation plan; and

(iv) The previous regional emissions analysis is consistent with the requirements of §§93.118 (including that conformity to all currently applicable budgets is demonstrated) and/or 93.119, as applicable.

(2) A project which is not from a conforming transportation plan and a conforming TIP may be demonstrated to satisfy the requirements of §93.118 or §93.119 without additional regional emissions analysis if allocating funds to the project will not delay the implementation of projects in the transportation plan or TIP which are necessary to achieve the highway and transit system envisioned by the transportation plan, the previous regional emissions analysis is still consistent with the requirements of §93.118 (including that conformity to all currently applicable budgets is demonstrated) and/or §93.119, as applicable, and if the project is either:

(i) Not regionally significant; or

(ii) Included in the conforming transportation plan (even if it is not specifically included in the latest conforming TIP) with design concept and scope adequate to determine its contribution to the transportation plan's regional emissions at the time of the transportation plan's conformity determination, and the design concept and scope of the project is not significantly different from that described in the transportation plan.

The 2007 TIP/Amendment #07-18 meets these requirements:

- The TIP contains all projects, which must be started in the TIP's timeframe in order to achieve the highway and transit system envisioned by the transportation plan.
 - All TIP projects which are regionally significant are included in the Transportation 2030 Plan and have a design concept and scope adequate to determine their contribution to the Transportation 2030 Plan's regional emissions at the time of the regional transportation plan's conformity determination.
 - The design concept and scope of each regionally significant project in the TIP is not significantly different from those described in the Plan.
 - All projects in the 2007 TIP/Amendment #07-18 are from a conforming Plan. Allocating funds to these projects will not delay the implementation of projects in the Plan or TIP, which are necessary to achieve the highway and transit system envisioned by the Plan.
4. Results of Previous Regional Emissions Analysis Comparing the Motor Vehicle Emissions to Budgets: Motor vehicle emissions in the Bay Area must not exceed the applicable budgets measured in tons per day for volatile organic compounds (VOCs), nitrogen oxides (NO_x) and carbon monoxide (CO) as contained in the State Implementation Plan (SIP). The vehicle activity forecasts (Table 2) and motor vehicle emissions calculations (Tables 3A and 3B) for the previous emissions analysis are provided below. The results of the previous regional emissions analysis show that regional emissions are below the applicable budgets. Please refer to the above referenced Conformity Report for details on this analysis.

**TABLE 2
VEHICLE ACTIVITY FORECASTS***

	2006	2007	2015	2025	2030
Vehicles in Use	5,084,099	5,146,988	5,884,899	6,769,168	7,269,775
Daily VMT (1000s)	172,298	174,090	194,776	218,793	232,621
Engine Starts	33,893,781	34,247,285	38,510,161	43,292,850	45,971,240

*VMT forecasts have been adjusted per CARB recommended methods (see Appendix B)

TABLE 3A
EMISSIONS BUDGET COMPARISONS FOR OZONE
(TONS/DAY WITH BUDGETS BASED ON SF BAY AREA-EMFAC 2000 AND ON ROAD
MOTOR VEHICLE EMISSIONS USING MORE CURRENT EMFAC 2002, V2.2)

Year	VOC Budget	On-Road Motor Vehicles VOC	TCMs*	Net Emissions
2006	164.0	126.5	(0.3)	126.2
2007	164.0	116.3	(0.3)	116.0
2015	164.0	68.6	(0.3)	68.3
2025	164.0	44.6	(0.3)	44.3
2030	164.0	38.2	(0.3)	37.9

Year	NO _x Budget	On-Road Motor Vehicles NO _x	TCMs*	Net Emissions
2006	270.3	248.8	(0.5)	248.3
2007	270.3	229.8	(0.5)	229.3
2015	270.3	123.5	(0.5)	123.0
2025	270.3	67.0	(0.5)	66.5
2030	270.3	55.9	(0.5)	55.4

*The transit services for TCM A Regional Express Bus Program were modeled. The emission benefits from TCM A are therefore included in the On-Road Motor Vehicles VOC and NO_x emission inventories for 2006 and beyond.

TABLE 3B
EMISSIONS BUDGET COMPARISONS FOR CARBON MONOXIDE

Year	2004 CO Budget*	Estimated CO
2006	1,850	1,320.0
2007	1,850	1,204.9
2015	1,850	647.8
2018 (interpolated)	1,850	558.5
2025	1,850	350.2
2030	1,850	297.0

* 2004 Revision to the California State Implementation Plan for Carbon Monoxide, Updated Maintenance Plan for 10 Federal Planning Areas

5. Financial Constraint. The 2007 TIP is financially constrained based on revenue estimates from the State at the time of its preparation. The 2007 TIP covers the four fiscal years FY 2006-07 through FY 2009-2010. The FHWA/FTA approved the 2007 TIP on October 2, 2006. Amendment #07-18 adds funding into eight (8) exempt projects, two (2) new non-exempt projects and updates the funding and scope for another non-exempt project. Funds added are from the UPP grants awarded to the region by the US DOT.
6. Interagency and Public Consultation. The prior regional conformity analysis leading to FHWA and FTA's approval in May 2007 underwent extensive agency and public consultation as documented in the Conformity Report. For 2007 TIP/Amendment #07-18, MTC initially consulted on this amendment with its Air Quality Conformity Task Force on October 30, 2007.

II. RESPONSE TO COMMENTS

Forthcoming. This draft conformity analysis will be released for a 30-day public review and comment period beginning on November 9, 2007 and ending at 1:00 pm on December 10, 2007. MTC will respond in writing to all written comments on this draft conformity analysis, and will then prepare a final conformity analysis (which includes response to comments).

The draft conformity analysis will be presented for review at the November 9, 2007 Planning Committee meeting; and a final conformity analysis will be presented for final approval at the December 19, 2007 Commission meeting. The final conformity analysis will be then submitted to the Federal Highway Administration and Federal Transit Administration for joint review as required by 40 CFR 93.104 and 23 CFR 450.322 of the FHWA/FTA Statewide and Metropolitan Planning Rule.

III. CONFORMITY FINDINGS

Based on the analysis, the following conformity findings are made:

- This conformity assessment was conducted consistent with EPA's regulations and with the Bay Area Air Quality Conformity Procedures adopted by MTC as Resolution No. 3757.
- The 2007 Transportation Improvement Program/Amendment 07-18 provide for implementation of TCMs pursuant to the following federal regulation:
 - (1) An examination of the specific steps and funding source(s) needed to fully implement each TCM indicates that TCMs which are eligible for funding under title 23 U.S.C. or the Federal Transit Laws are on or ahead of the schedule established in the applicable implementation plan, or, if such TCMs are behind the schedule established in the applicable implementation plan, the MPO and DOT have determined that past obstacles to implementation of the TCMs have been identified and have been or are being overcome, and that all State and local agencies with influence over approvals or funding for TCMs are giving maximum priority to approval or funding to TCMs over other projects within their control, including projects in locations outside the non-attainment or maintenance area.*
 - (2) If TCMs in the applicable implementation plan have previously been programmed for Federal funding but the funds have not been obligated and the TCMs are behind the schedule in the implementation plan, then the TIP cannot be found to conform if the funds intended for those TCMs are reallocated to projects in the TIP other than TCMs, or if there are no other TCMs in the TIP, if the funds are reallocated to projects in the TIP other than projects which are eligible for Federal funding intended for air quality improvements projects, e.g., the Congestion Mitigation and Air Quality Improvement Program.*
 - (3) Nothing in the TIP may interfere with the implementation of any TCM in the applicable implementation plan. (40 CFR Part 93.113(c)).*
- For carbon monoxide, motor vehicle emissions in the 2007 Transportation Improvement Program/Amendment 07-18 are lower than the transportation conformity budget in the SIP.
- For Volatile Organic Compounds (VOC) and Nitrogen Oxides (NO_x), motor vehicle emissions in the 2007 Transportation Improvement Program/Amendment 07-18 are also lower than the applicable motor vehicle emission budgets for the 8-hour ozone standard.

Attachment D
Draft Conformity Analysis for the 2007 TIP/Amendment

APPENDIX A: 2007 TIP/AMENDMENT 07-18 PROJECT LISTING

APPENDIX A: LIST OF PROJECT AND FUNDING TO BE AMENDED INTO THE 2007 TIP AMENDMENT 2007-18

TIP ID	RTP ID	AQ STATUS	SPONSOR	COUNTY	PROJECT NAME	REASON FOR AMENDMENT	FUNDING CHANGE
ALA070021		Non-Exempt, Non-Regionally Significant	LAVTA	ALA	LAVTA Bus Rapid Transit (BRT) System Ph. 1 & 2	Update project scope and funding.	\$ 13,401,000
ALA070058	21160	Exempt	AC Transit	ALA	Grand/MacArthur Blvd Corridor Improvements	Amend in new project funded with Urban Partnership grant of \$350k.	\$ 350,000
MRN070018	22157	Non-Exempt, Non-Regionally Significant	GGBHTD	MRN	Larkspur Ferry Terminal Parking Improvements	Amend new project funded with \$12.8M in Urban Partnership Grant.	\$ 12,800,000
REG070010	21005	Exempt	MTC	REG	Reg Parking Payment/Integrated Mobility Account	Amend in \$2M in Urban Partnership Program grants.	\$ 2,000,000
SF-070040	21005	Exempt	SF MTA	SF	SF Downtown Parking Management	Amend in \$20m of Urban Partnership Grants.	\$ 20,000,000
SF-070041	21005	Exempt	SF County TA	SF	SF Integrated Mobility Account	Amend in \$11.2M Urban Partnership Program Grants	\$ 11,200,000
SF-070042	21005	Exempt	SF County TA	SF	Urban Partnership Program Evaluation	Amend in \$400k in Urban Partnership Program grants.	\$ 400,000
REG050017	21008	Exempt	MTC	REG	511 Traveler Information	Amend in \$6.6M in Urban Partnership Grants	\$ 6,600,000
SF-070030	21506	Exempt	SF MTA	SF	SFgo-Corridor Management	Amend in Urban Partnership grant of \$58m.	\$ 58,000,000
SF-070043	94089	Non-Exempt, Non-Regionally Significant	SF County TA	SF	Doyle Drive Congestion Tolling	Amend in project funded with \$12m in UPP Grants.	\$ 12,000,000
SF-991030	94089	Exempt	SF County TA	SF	US 101 Doyle Drive Replacement	Exchange RIP funds of \$54m with Local funds and reprogram to FY11. Also amend in \$35.5 m in Urban Partnership Grants and update project costs.	\$ 190,000,000

TOTAL \$ 326,751,000